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February 11, 2025

Via ECF

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL;***  
***rel. Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL***

Dear Judge Liman:

As counsel for Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), we write in response to yesterday’s letter from counsel for Blake Lively and Ryan Reynolds (the “Lively Parties”), which requests extensions of their deadlines to amend their Complaint and to file a motion to dismiss the Wayfarer Parties’ Amended Complaint.

Notwithstanding the Lively Parties’ inexplicable refusal to consent to a similar extension requested by the Wayfarer Parties in the throes of the Los Angeles wildfires, the Wayfarer Parties have no objection to the extensions sought by the Lively Parties. However, if the Court extends the Lively Parties’ deadline to amend their Complaint to **March 5, 2025**, the Wayfarer Parties respectfully request that the Court extend the Wayfarer Parties’ deadline to respond thereto to **April 16, 2025**.

Unfortunately, the Lively Parties’ letter goes further than a simple request for an extension of time, leveling unnecessary and baseless attacks on non-party Jed Wallace and the litigation pending against Ms. Lively in the United States District Court for the Western District of Texas (Civil Action No. 1:25-cv-00163). What the Lively Parties conspicuously fail to mention is that the now-pending litigation in Texas was precipitated by Ms. Lively, who initiated legal action against Mr. Wallace in Texas state court on January 21, 2025, approximately two weeks before he filed his federal lawsuit in response.

While the Lively Parties now claim that Mr. Wallace’s Texas action suffers from “serious issues with respect to jurisdiction, venue, and claims....” (Dkt. 65, p. 2), in Ms. Lively’s verified petition seeking a pre-suit deposition of Mr. Wallace, Ms. Lively acknowledges that jurisdiction in Texas is proper given Mr. Wallace’s domicile. A true and correct copy of Ms. Lively’s petition is attached hereto as Exhibit A. Notably, in her pleading, Ms. Lively concedes that she lacks sufficient facts to state a claim against Mr. Wallace, hence the need for pre-suit discovery. In

addition, while the Wayfarer Parties strenuously object to the Lively Parties' assertion that Mr. Wallace's lawsuit is "meritless" or "unmeritorious[,]" (Dkt. 65, p. 2), it bears emphasis that Mr. Wallace is represented by separate counsel in that matter, and he is not a party in any case before this Court.

In summary, although the Wayfarer Parties take exception to many of the representations advanced in the Lively Parties' letter, the Wayfarer Parties do not oppose their request for an extension, and in turn request a corresponding extension of the Wayfarer Parties' deadline to respond to the Amended Complaint to April 16, 2025.

Respectfully submitted,  
*Mitchell Schuster*  
Mitchell Schuster

cc: all counsel of record (via ECF)